

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Cathy L. Waldor, U.S.M.J.
	:	
v.	:	Magistrate. No. 25-9209
	:	
YUSUF TINSLEY	:	<b>CRIMINAL COMPLAINT</b>

I, Jessica Guiliano, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

/s/ Jessica Guiliano

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Jessica Guiliano, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Special Agent Guiliano attested to this Affidavit by telephone pursuant to F.R.C.P. 4.1(B)(2)(A) on this 15th day of May, 2025.

/s/ Cathy L. Waldor

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Hon. Cathy L. Waldor  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Possession of a Firearm and Ammunition by a Convicted Felon)

On or about May 15, 2025, in the District of New Jersey and elsewhere,  
the defendant

**YUSUF TINSLEY,**

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm and ammunition, namely, a Glock Model 21 .45 ACP handgun bearing serial number AGUT589 and approximately 10 rounds of .45 ammunition, and the firearm and ammunition were in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

(Possession of a Machine Gun)

On or about May 15, 2025, in the District of New Jersey and elsewhere,  
the defendant,

**YUSUF TINSLEY,**

did knowingly possess a machine gun, as defined in Title 26, United States Code, Section 5845(b), namely, a Glock Model 21 .45 ACP handgun bearing serial number AGUT589, equipped with a machine gun conversion device.

In violation of Title 18, United States Code, Section 922(o)(1).

**COUNT THREE**

(Possession with Intent to Distribute Cocaine and Fentanyl)

On or about May 15, 2025, in the District of New Jersey and elsewhere,  
the defendant,

**YUSUF TINSLEY,**

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**ATTACHMENT B**

I, Jessica Guiliano, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives (“ATF”). I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. Since as early as in or around June 2024, law enforcement, including ATF, has been investigating a drug trafficking organization (“DTO”) operating in and around Essex County, New Jersey and elsewhere. To date, the investigation has included such techniques as controlled purchases of narcotics, electronic and physical surveillance, analysis of call detail records, lawful searches, narcotics seizures, firearms seizures, and law enforcement sources.

2. Pursuant to this investigation, on or about May 15, 2025, law enforcement executed a search warrant at an apartment within a building located on Berwyn Street in East Orange, New Jersey (the “Apartment”). Upon searching the Apartment, law enforcement encountered Yusuf Tinsley (“TINSLEY”). After detaining TINSLEY, who was the only occupant of the Apartment at the time, law enforcement commenced a search.

3. During a search of a dresser drawer in the bedroom of the Apartment, law enforcement recovered a firearm—namely, a Glock Model 21 .45 ACP handgun bearing serial number AGUT589, equipped with an auto sear selector switch<sup>1</sup> (the “Machinegun”). In light of the auto sear selector switch, the Machinegun meets the federal definition of a machinegun, as defined in Title 26, United States Code, Section 5845(b). The dresser drawer in which the Machinegun was located also contained an extended magazine containing approximately 10 rounds of .45 ammunition, men’s underwear, and 6 credit cards bearing TINSLEY’s name.

4. Law enforcement also recovered from the Apartment a quantity of a white powdery substance, which field tested positive for the presence of fentanyl; a quantity of a rock-like substance, which field tested positive for the presence of cocaine; a white powdery substance, which field tested positive for the presence of cocaine; a quantity of suspected marijuana; approximately 950 glassine envelopes containing suspected heroin; and 2 bottles of promethazine.

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<sup>1</sup> An auto sear selector switch is a machinegun conversion device, which renders a firearm capable of being fired in fully automatic mode.

Additionally, law enforcement recovered from the residence various materials of drug paraphernalia, known to be utilized for packaging narcotics.

5. The Machinegun and the ammunition were manufactured outside of the State of New Jersey, and thus traveled in interstate commerce prior to TINSLEY's possession of them in New Jersey on or about May 15, 2025.

6. On or about June 17, 2016, TINSLEY was convicted in the Superior Court of New Jersey, Essex County, for resisting arrest, in violation of N.J.S.A. 2C:29-2(a); manufacturing/distributing CDS, in violation of N.J.S.A. 2C:35-5(a)(1); and unlawful possession of a weapon, in violation of N.J.S.A. 2C:39-5(b), which are all crimes punishable by a term of imprisonment exceeding one year. TINSLEY was sentenced to 10 years' imprisonment in connection with these convictions.